

STATE OF IOWA

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DEPARTMENT OF EDUCATION
JUDY A. JEFFREY. DIRECTOR

DATE: February 1, 2005

TO: All Child and Adult Care Food Program (CACFP) Independent

Centers (IC) and Center Sponsors (CS)

FROM: Rod Bakken, CACFP Lead Consultant and Robin Searles, Consultant

SUBJECT: Enrollment Forms and Training Requirements

On September 30 and October 19, 2004 the Bureau of Nutrition Programs and School Transportation of the Iowa Department of Education, also referred to as the State Agency (SA), issued Memos IC-2004-1 and CS 2005-1 respectively, informing you about the 2nd Interim Rule published by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) entitled, "Child and Adult Care Food Program: Improving Management and Program Integrity" (69 FR 53501). Please refer to either of those memos for details about the rule.

Since that memo was issued, the SA has finalized implementation procedures regarding changes required by the 2^{nd} Interim Rule for enrollment form and training requirements. The purpose of this memo is to provide you with the information needed to implement these changes.

Enrollment Form Requirements

The interim rule requires that enrollment forms be updated annually and signed by a parent or guardian, and that the forms indicate the "normal" days in care and types of meals normally to be received by each enrolled child. CACFP enrollment forms are required in both sponsored and independent child care centers, but are not required for "At-risk Afterschool Snack Programs", outside-school-hours care centers and homeless shelters unless the center is licensed. While enrollment forms are required for adult day care centers, the requirement for an annual enrollment update does not apply.

The intent of this regulation change is to ensure that the child's presence in the center and the child's normal schedule are annually verified by a parent or guardian, and that the information is available to State or Federal CACFP reviewers during an on-site visit. For centers in Iowa, we believe the easiest way to capture this information is on **the enrollment form that must annually be submitted by the households of children in**

care. This information may be included on the center's enrollment form, or a separate CACFP enrollment form may be used (sample form enclosed).

All participants, including infants enrolled for care, must be enrolled in the CACFP. A separate enrollment form should be completed for each participant. If the center cares for infants, it is recommended that the attached sample CACFP enrollment form be used, since it also meets existing Civil Rights requirements to document that the center offers CACFP benefits to parents of infants. However, the form may be used for all children. If the form is used for infants, but not for older participants, the center will need to create a separate form for older participants or revise its existing enrollment form to include the required information (child's name, date, parent or guardian signature, child's normal attendance and meal participation).

The interim rule requires that new procedures for annual updates to the enrollment form, signed by a parent or guardian and indicating the child's normal attendance schedule and meal participation, must be implemented by April 1, 2005. This means that any enrollment form for newly enrolled children, collected on or after that date, will need to comply with the new requirements. For annual enrollment forms already on file before April 1, 2005, the changes must be made the next time forms are updated and no later than September 30, 2005.

Training Requirements

The interim rule requires mandatory training for key staff at all independent and sponsored centers, both before Program participation and annually thereafter. In Iowa a minimum of one and one half (1.5) annual CACFP-related training hours are required each fiscal year. The SA defines the "key staff" that must attend training as:

- Owners of private "for-profit centers" (if applicable);
- Staff with CACFP responsibilities including but not limited to:
 - o Administrative staff,
 - o Food service staff,
 - Site monitors (staff that review sponsored centers);
 - All teachers/staff with mealtime responsibilities;
- Volunteers or board members with:
 - o Primary CACFP mealtime responsibilities, and/or
 - o Decision-making responsibilities pertaining to the claim.

Volunteers who work under the direct supervision of trained key CACFP staff members are not identified as key staff. However, it is recommended that volunteers receive adequate training needed to carry out their responsibilities. Although board members are generally not identified as key staff required to attend training, they play a valuable role in Program oversight and we highly recommend that they attend applicable SA CACFP workshops.

All topics should be CACFP-related; minimum topics to include in training, as applicable, to appropriate staff are:

- Meal patterns,
- Meal counts,
- Claims submission and review procedures,
- Record keeping requirements,
- An explanation of the Program's reimbursement system and
- Mealtime expectations and responsibilities of supervising adults at mealtime.

All training must be adequately documented to show that requirements have been met for all new and existing employees. Please refer to the "CACFP Record Keeping Manual for Centers" for documentation forms and requirements (pp. 111-112 and 121-122). We recommend that you develop a checklist of items to cover for new staff so training is consistent and all required topics for that position are covered. A sample form for new staff orientation is on page 122 of the "CACFP Record Keeping Manual for Centers". In addition it may be helpful to develop a form to track training for a each fiscal year, to ensure that requirements are met (sample form attached).

If you have questions pertaining to this memo, please contact Rod Bakken at (515) 281-4760 or Robin Searles at (515) 281-3484.

Attachments:

Attachment 1—Sample Child Care Enrollment Form (also fulfills requirement to document that the center offered at least one infant formula to parents of infants.) Attachment 2—CACFP Tracking Worksheet for Training Requirements